

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

ROBERT YOUNG,)	
)	
Plaintiff,)	
)	
vs.)	
)	
EAST TEXAS MEDICAL CENTER)	
REGIONAL HEALTHCARE SYSTEM, INC.,)	Case No. 17-CV-0101-RAW-JFJ
EAST TEXAS MEDICAL CENTER)	
REGIONAL HEALTH SERVICES, INC.,)	
PARAMEDICS PLUS, LLC,)	
EMERGENCY MEDICAL SERVICES)	
AUTHORITY,)	
HERBERT STEVEN WILLIAMSON,)	
KENT TORRENCE, RON SCHWARTZ, and)	
ELMER ELLIS,)	
)	
Defendants.)	

NOTICE OF PARTY NAME CORRECTION

Defendants, East Texas Medical Center Regional Healthcare System, Inc. and East Texas Medical Center Regional Health Services, Inc., hereby submit this Notice of Party Name Correction and state as follows:

1. On April 24, 2017, Plaintiff filed an Amended Complaint. (Dkt. # 33). The style of the Amended Complaint denominated “ETMC System” and “ETMC Services” as defendants, which led the Clerk of this Court to terminate East Texas Medical Center Regional Healthcare System, Inc. and East Texas Medical Center Regional Health Services, Inc. as parties.

2. East Texas Medical Center Regional Healthcare System, Inc. and East Texas Medical Center Regional Health Services, Inc. believe that this was erroneous. There are no such entities, and the allegations of the Amended Complaint clearly are directed toward East Texas

Medical Center Regional Healthcare System, Inc. and East Texas Medical Center Regional Health Services, Inc.

3. The proper defendants in this matter are East Texas Medical Center Regional Healthcare System, Inc. and East Texas Medical Center Regional Health Services, Inc., on whose behalf the pending motion to dismiss, initial disclosures, the joint status report, and the prior corporate disclosure statements (Dkt. # 25 and 26) have been filed.

4. Neither “ETMC System” nor “ETMC Services” should be defendants in this matter, as no such entities exist and no filings could be made on their behalf.

5. But if through discovery Plaintiff believes that different entities should be named as defendants, he is not precluded from seeking leave to name them in the ordinary course of the Federal Rules.

Respectfully submitted,

/s/ Ryan A. Ray
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-and-

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**ATTORNEYS FOR DEFENDANTS,
EAST TEXAS MEDICAL CENTER REGIONAL
HEALTHCARE SYSTEM, INC. AND EAST TEXAS
MEDICAL CENTER REGIONAL HEALTH SERVICES,
INC.**

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2017, a true and correct copy of the above and foregoing instrument was served via CM-ECF upon the following:

Bobby L. Latham, Jr., Esq. Marcus N. Ratcliff, Esq. Brandy L. Inman, Esq. Heather M. Kinsaul, Esq. Robert K. Pezold, Esq. Dan S. Folluo, Esq. Kristopher E. Koepsel, Esq.	John J. Carwile, Esq. Sharon K. Weaver, Esq. Donald M. Bingham, Esq. Lauren M. Marciano, Esq.
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/s/ Ryan A. Ray
Ryan A. Ray